

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	Case No. 22-10259-TPA
	:	
Michael Wallace Yochum,	:	
Debtor,	:	Chapter 13
	:	
Michael Wallace Yochum,	:	
Movant,	:	Related to Docket No: 27
	:	
vs.	:	
	:	
Oil Creek Township,	:	
	:	
AND	:	
	:	
Ronda J. Winnecour, Esq.,	:	
Chapter 13 Trustee,	:	
Respondents.	:	

**CERTIFICATE OF NO OBJECTION REGARDING DEBTOR'S MOTION TO  
AVOID AND CANCEL A JUDGMENT LIEN ON REAL ESTATE  
WHICH IMPAIRS EXEMPTIONS OF THE DEBTOR**

The undersigned hereby certifies that, as of the date hereof, no Answer, Objection or other Responsive Pleading to the MOTION TO AVOID AND CANCEL A JUDGMENT LIEN ON REAL ESTATE WHICH IMPAIRS EXEMPTIONS OF THE DEBTOR, filed on August 24, 2022, has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no Answer, Objection or other Responsive Pleading to the Complaint appears thereon. Pursuant to the Notice of Hearing, Objections to the Complaint were to be filed and served no later than September 10, 2022.

It is hereby respectfully requested that the Order attached to the Motion be entered by the Court.

Date: September 12, 2022

Respectfully submitted,  
/s/ Daniel P. Foster, Esquire  
Daniel P. Foster  
PA I.D. # 92376  
Foster Law Offices  
1210 Park Avenue  
Meadville, PA 16335  
Phone: 814.724.1165  
Fax: 814.724.1158  
Email: [dan@mrdebtbuster.com](mailto:dan@mrdebtbuster.com)  
Attorney for Debtor

**CERTIFICATE OF SERVICE**

I, the undersigned Paralegal of Foster Law Offices, certify under penalty of perjury that I am more than 18 years of age, and that I served a true and correct copy of the CERTIFICATE OF NO OBJECTION REGARDING DEBTOR'S MOTION TO AVOID AND CANCEL A JUDGMENT LIEN by First-Class Mail, U.S. Postage Paid on the parties below\*.

Executed on: September 12, 2022

By: /s/ Kathryn Schwartz  
Kathryn Schwartz, PARALEGAL  
FOSTER LAW OFFICES  
1210 Park Avenue  
Meadville, PA 16335  
Tel 814.724.1165  
Fax 814.724.1158

MATRIX

**Michael Yochum**

23095 Titusville Road  
Titusville, PA 16354  
*Service via U.S. Mail*

**Oil Creek Township**

16835 Shreve Run Road  
Pleasantville, PA 16341  
*Service via U.S. Mail*

**Bruce L. Getsinger, Esq.**

1243 Liberty Street  
Suite 307  
Franklin, PA 16323  
*Service via U.S. Mail*

**Office of the U.S. Trustee**

[ustpregion03.pi.ecf@usdoj.gov](mailto:ustpregion03.pi.ecf@usdoj.gov)  
*Service via CM/ECF*

**Ronda J. Winnecour**

[cmecf@chapter13trusteewdpa.com](mailto:cmecf@chapter13trusteewdpa.com)  
*Service via CM/ECF*